## **REVISED EXHIBIT B-3**

## PLAINTIFFS' PROPOSED SETTLEMENT NOTICE PLAN

Consistent with the requirements of Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs propose to provide notice to Class Members of the Proposed Settlement as follows:

- 1. <u>Direct Notice</u>. Direct Long Form Notice, with a Claim Form, will be sent by first-class mail to (i) each Medicare Part B beneficiary administered Zoladex® during the Class Period and whose names and addresses are readily identifiable from data provided by the Centers for Medicare & Medicaid Services ("CMS") (mail will be address-corrected if returned and remailed, if possible); and (ii) all callers to a toll-free information line who request the Long Form Notice.
- 2. <u>Published Notice</u>. Notice will be published on the Settlement Administrator's Notice Web site, as well as the Web sites maintained by Lead Counsel. A toll-free number for the Settlement Administrator's information line will prominently appear in the Published Notice. Class Members may also download the Long Form Notice, in PDF format, from the Notice Web Site. The site will be designed for ease of use and comprehension. Web pages on the site will be simple, containing words, icons, documents and images.